

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION

FORMAL COMPLAINT
Illinois Commerce Commission
527 E. Capitol Avenue

ORIGINAL

ILLINOIS ^{WM}
COMMERCE COMMISSION

06-0168

Regarding a complaint by (Person making the complaint)

Barbara R. Miller and Chuck Nwaneshiudu

Against (Utility Name):

Respondent Natural Gas Corporation

Santanna Energy Services
CHIEF CLERK'S OFFICE

As to (Reason for Complaint): Respondent Natural Gas Corporation ignored complainant's legitimate billing dispute in 2001 and 2002 and is currently using the court system to try and force complainant's to pay an amount they do not owe. Respondent claims \$10,621.73 principal and over \$45,000 in attorney fees and interest. Complainants contend that respondent is owed less \$4,729.10 (minus Peoples Gas over charges from 2001 to 2002), which will reduce this amount even more. There exists no just reason for Respondent to delay settling this matter since the debt amount is incorrect and also since there is due complainant's an undetermined adjustment from Peoples gas for over charges in 2001-2002, according to the ICC and the Illinois Attorney General. (further feel any refund should be based on usage, i.e. complainant's gas bill for their real estate property went from approximately \$2,500 for January and February in 2000 to almost \$10,000 in January and February 2001. For State government to be fair about refunds from Peoples Gas, the ICC must not ignore the fact that refunds should be based on usage. Any refund complainant's receive from the State will be applied to complainant's gas bill which will reduce the bona fied amount considerably.

* Docket #: 03M1-126454 and #05L-12260

THE ILLINOIS COMMERCE COMMISSION, SPRINGFIELD ILLINOIS: Informal Complaint # 2002-22829S

My mailing address is:

500 East 33rd Street #1100, Chicago, IL 60616

The service address that I am complaining about is:

4716-18 South King Drive, Chicago, Illinois

My home telephone is:

(312) 420-1276

Between 8:30 A.M. and 5:00 P.M. weekdays. I can be reached at: (312) 744-5005

Santanna Energy Services

(Full name of utility company)

Respondent Natural Gas Corporation (respondent) is a public utility and is subject to the provisions of the Illinois Public Utilities Act.

In the space below, list the specific section of the law. Commission rule(s) or utility tariffs that you think is involved with your complaint:

- 1) 2001 Report Concerning the Billing Practices of Public Utilities Providing Gas Service to Consumers in Illinois, page 6.
- 2) Consumer Fraud Deceptive Business Practices Act, 815A ILCS 505/2 (from Ch. 121 1/2, par. 262) Section 2; 505/25; 5052MM;
- 3) 220 ILCS 5/19-115
- 4) 220 ILCS 5/19-120(c)

Have you contacted the Consumer Services Division of the Illinois Commerce Commission about your complaint?

☒ Yes ☐ No

Has your complaint filed with that office been closed?

☐ Yes ☒ No

Please state your complaint briefly. Number each of the paragraphs. Please include period and dollar amounts involved with your complaint. Use an extra sheet of paper if needed.

1. There exists no just reason for plaintiff to take such aggressive and abusive actions against Complainant's for the following reasons:
 - a. Complainant's have been more than willing to settle this dispute with arbitration but respondents have refused;
 - b. The default judgment amount of \$50,519.28 is not a bona fide debt ;
 - c. Plaintiff has not yet provided the Court with invoices or payment and adjustment records so that the court can conclude for itself whether the default judgment amount is correct;
2. Complainant's bona fide debt is \$4,729.10 (minus a yet to be determined adjustment from People's Gas for 2001 and 2002 over charges;
3. Plaintiff's abusive collection activities are illegal pursuant to the US Collection Code, Section 1692(d) that governs abusive collection practices and whose mission is to protect consumers against debt collection abuse:
4. Plaintiff's refusal to resolve the billing dispute violates the ICC's rules govern the resolution of billing disputes by energy providers in the State of Illinois, "2001 Report Concerning the Billing Practices of Public Utilities Providing Gas Service to Consumers in Illinois", page 6.
5. Complainant's appeal to the Commission to bring this frivolous case to and end;
6. Respondent's legal bills far exceed the amount plaintiff claims, but plaintiff continues has refused to entertain settlement since 2003;
7. Plaintiff is using the court system to force defendant's to pay a debt they do not owe, in order to bypass the rules of procedure for debt the collection code;
8. Plaintiff's strategy to force the sale of defendant's personal property over an erroneous default judgment amount, if sanctioned by in civil court would further be a travesty of justice since Complainant's do now owe the amount respondent claims.

Please clearly state what you want the Commission to do in this case.

Defendant's want the Commission to:

- 1) Intervention and billing dispute resolution with reparations or any other remedy the Commission deems fair and just.

Date February 27, 2006

Complainant's Signature: Barbara Miller

Complainant's Signature: [Signature]

If an attorney will represent you please give the attorney's name address and telephone number. This is a pro se complaint. You need to file the original with the Commission. Also provide one copy for each utility complained about (referred to s respondents)

Verification

A notary public must witness the completion of this party of the form.

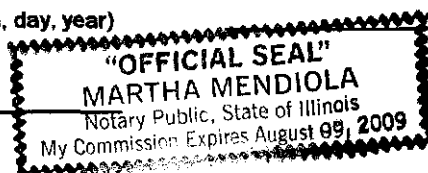
I, Barbara Miller and CHUCK NUNATSHUPU first being duly sworn, say that I have read the above petition and know what it say:
The contents of this petition are true in the best of my knowledge.

(Signature) [Signature]

(Signature) [Signature]

Subscribed and sworn/affirmed to before me on (month, day, year)

Martha Mendiola
Notary Public Illinois 2-27-06



NOTE: Failure to answer all of the questions on this form may result in this form being returned without processing. If you have questions, please call Counselor in the Consumer Services Division that handled your informal complaint.